

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Docket No. 3:22-cr-00118-TAV-JEM</b>
	)	<b>JUDGE VARLAN</b>
<b>EDWARD KELLEY,</b>	)	<b>Magistrate Judge McCook</b>
	)	
<b>Defendant.</b>	)	

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**DEFENDANT EDWARD KELLEY’S MOTION TO STRIKE UNITED STATES  
SENTENCING MEMORANDUM**

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COMES the Defendant Edward Kelley (“Kelley”) by and through counsel and hereby moves this Court to strike from the record the United States Sentencing Memorandum (Doc. No. 127), or in the alternative order that the document be placed under seal.

In support of this Motion, Kelley submits that the Sentencing Memorandum contains scandalous and unsubstantiated, not to mention uncharged allegations that have no relevance to the defendant’s sentencing.

The unsubstantiated and uncharged allegations referenced therein place Kelley in a false light and should not be part of the record in this case.

This is the 18<sup>th</sup> day of June 2025.

/s/ Mark E. Brown  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of June 2025 a true and exact copy of this document has been served via this Court's electronic filing system with service on all those appearing on this Court's electronic service certificate. All parties in interest may access this pleading via ECF.

/s/ Mark E. Brown

Mark E. Brown